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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

APR 28 2005  
at 11 o'clock and 30 min. AM  
WALTER A.Y.H. CHINN, CLERK

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 05-00116 HG
	)	
Plaintiff,	)	FIRST SUPERSEDING INDICTMENT
	)	
vs.	)	[21 U.S.C. Sections
	)	841(a)(1), 841(b)(1)(A)
	)	and 846
ISRAEL PEREZ (01),	)	
LUIS ALFREDO SARAVIA (02),	)	
	)	
Defendants.	)	

FIRST SUPERSEDING INDICTMENT

COUNT 1

The Grand Jury charges that:

From a time unknown up through and including on or about March 17, 2005, in the District of Hawaii and elsewhere, defendants ISRAEL PEREZ and LUIS ALFREDO SARAVA, also known as "Uncle Lui," knowingly and intentionally conspired with others

known and unknown to the Grand Jury, to distribute and possess with intent to distribute 500 grams or more of a substance and mixture containing a detectable amount of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code Sections 846, 841(a)(1) and 841(b)(1)(A).

OVERT ACTS

In furtherance of this conspiracy and in order to attain the objects thereof, the following overt acts, among others, were committed in the District of Hawaii and elsewhere:

1. During the period beginning in approximately January, 2004, defendant ISRAEL PEREZ travelled to Honolulu, Hawaii and delivered pound quantities of methamphetamine to co-conspirators, not charged as defendants.
2. During the period beginning in approximately January, 2004, defendant ISRAEL PEREZ received payment for the methamphetamine delivered to his co-conspirators.
3. During the period beginning in approximately January, 2004, defendant LUIS ALFREDO SARAVIA drove co-defendant ISRAEL PEREZ to the meetings where methamphetamine and money was exchanged.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

COUNT 2

The Grand Jury further charges that:

On or about March 17, 2005, in the District of Hawaii, Defendants ISABEL PEREZ and LUIS ALFREDO SARAIVA did knowingly and intentionally attempt to distribute 500 grams or more of methamphetamine, its salts, isomers and salts of its isomers, to wit, approximately two pounds, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841 (a) (1), 841 (b) (1) (A) and 846.

COUNT 3

The Grand Jury further charges that:

On or about March 17, 2005, in the District of Hawaii, Defendant ISABEL PEREZ did knowingly and intentionally possess with intent to distribute 500 grams or more of methamphetamine, its salts, isomers and salts of its isomers, to wit, approximately one pound, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a) (1), and 841(b) (1) (A).

COUNT 4

A. As a result of committing the offenses alleged in Counts 2 and 3 of this Indictment, Defendant Isael Perez shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting, or derived from, any proceeds which Defendant Isael Perez obtained, directly or indirectly, as

the result of such offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including but not limited to the following:

A. One 1995 Gold Colored BMW 525i  
Hawaii License Plate Number, GEJ 679, registered to  
Isael Perez, Vehicle Registration Number WBAHD  
63245GK84697

B. If any of the above-described forfeitable  
property, as a result of any act or omission of the Defendant --

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) to seek forfeiture of any other property of the Defendant up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Sections 853 and 21 U.S.C. §841(a)(1).

COUNT 5

The Grand Jury further charges that:

On or about March 17, 2005, in the District of Hawaii, Defendants ISABEL PEREZ and LUIS ALFREDO SARAVIA did knowingly and intentionally possess with intent to distribute 500 grams or more of methamphetamine, its salts, isomers and salts of its isomers, to wit, approximately two pounds, a Schedule II controlled substance, in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(A).

DATED: 4/28/05, at Honolulu, Hawaii.

A TRUE BILL

/s/

FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

  
FLORENCE T. NAKAKUNI  
Chief, Narcotics Section

  
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